

Compliance Workgroup Issue Identification

	Issue	Recommendation/Proposed Solution	Benefit	Comment	Status	Valid Issue	Priority
C1	Conducting disposition inspections on “no-permit” violations is not efficient. If a source does not have a permit, the only value of the disposition is to confirm that they applied for a permit. If the case is immediately referred to enforcement the source can verify they have applied for a permit through that process. If not, an inspection takes place every two weeks until the source obtains a permit.	Send violations for “no permit” directly to enforcement without a disposition inspection.	More efficient use of resources	Recommendation develop	Leadership Team Review Completed	Yes	High
C2	Inspections are documented on several different spreadsheets, as well as EMS documentation. The result is overlapping and duplicative data entry. Multiple inspection report forms are unnecessary.	Eliminate unnecessary elements of the form and reconfigure and add elements necessary to make a universal form.	Less time spent completing paperwork that is duplicative.	A single form is being developed to streamline this process.	Resolved Recommendation developed	Yes	High
C3	Records requests are being made using a variety of formats. This can lead to confusion and the “form” of the request may not meet a legal standard making the request enforceable.	Standardize the records request form.	Consistency in the issuance of records requests and greater enforceability.	To be combined with other related issues			
C4	Standard Operating Procedures – there may be too many (at this point a general comment not a specific suggestion to eliminate any particular SOP).	Evaluate the need for individual SOPs		Recommendation develop	Leadership Team Review Completed	Yes	High
C5	Documenting time - submittal of daily activity reports in EMS is repetitive and time consuming.	Reduce the administrative time-reporting burden on inspectors.	More time will be available for additional inspections.	Refers to daily activity tracking		Yes	Low



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C6	Issue deleted as replicate of C5						
C7	The department does not have the ability to immediately close a facility for non-compliance. In contrast, Environmental Services has the ability to close businesses for certain violations of public health rules.	Obtain the ability to immediately close a facility for non-compliance under certain, specified conditions. The department should have stronger abatement authority/language	Permit revocation is a rarely used and difficult process. The department should have an enforcement tool with this power to use when warranted.				
C8	Inspectors are assigned inspections on the basis of area assignments. This approach may not be the best way of making assignments. (combine w/ C9 and C12)	Develop District Maps for inspectors to conduct inspections	More efficient use of inspection efforts.		Recommendation developed	Yes	M
C9	The number of sites requiring inspection can be overwhelming.	Reduce the scope of review required.			Recommendation developed	Yes	M
C10	For vacant lot inspections there are significant data entry requirements to document “no action” observations.	Reduce the data entry effort required to document vacant lot compliance.	Improved efficiency.			Yes	Low
C11	Vacant lot inspections conducted during “sweeps” result in a high level of observed compliance.	Review vacant lot program approach to improve efficiency.	More time available to focus on higher priority work.	Recommendation developed	Recommendation developed	Yes	M-H
C12	Some inspection units may have a lighter workload compared to others.	Evaluate the workload among various units - small source, large source, and asbestos.	A more balanced and evenly distributed workload.		Recommendation developed	Yes	M

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C13	GIS capability for analysis of vacant lots is lacking.	Create a GIS capability for vacant lots allowing each to be monitored and tracked more efficiently.	GIS would provide a tool to visually determine inspection attributes of vacant lots.	Recommendation developed			
C14	While a permit is being developed, there should be a means for compliance/source testing to document and communicate outstanding/ongoing compliance issues to the permitting division. Compliance does have an opportunity to review permits but not enough time to do it because of other tasks.	Prior to permit issuance, compliance should be given an opportunity to review permit conditions as a means of ensuring enforceability. This might be limited to a subset of permits that represent those sources with high potential emissions or sources of special concern.	Increased enforceability of permit conditions would allow compliance plans (Rule 220 Section 303) to be incorporated into pending permit actions to help ensure specific deadlines and milestones are met.		Resolved Confirm which related issue		
C15	Issuance of a permit can result in the requirement to conduct a performance test within a specified timeframe (often within 60 days of permit issuance). However, sources may not meet this schedule and the delay may not be identified until long after the deadline has passed.	There should be a means of tracking source testing permit conditions in order to better ensure compliance. Create a database that prints out performance test completion dates.	Sources that fail to test can immediately be cited, reducing time spent in non-compliance and improving timely collection of emission data.	Recommendation developed		Yes	H



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C16	The fee payment system is not geared to providing the “customer” with a convenient manner of payment.	Allow payment online of certain fees, e.g., subcontractor fees and annual fees Allow printing of a receipt while online that can be shown to an inspector as proof of renewal.	Less paperwork to process. Better customer service.	This issue is also on the permitting issues listing.	Deleted – allow permitting group to address		
C17	Title V synthetic minor form (formatting)	Decrease number of forms to one or two forms.	Less time to complete paperwork for a large source inspection.	Recommendation developed		Yes	High
C18	Is a separate inspection form and inspection rights form required?	Consolidate inspection rights and inspection report form.		<i>Recommendation determined to be unnecessary. Continue to use separate inspection rights form</i>	Resolved		
C19	OCR (capturing text within permits (image documents SIRE)		Easier on file reviews and the permitting department.		Recommendation developed	Yes	Medium
C20	Standardization of SOPs		Related to C23	Recommendation developed (combined with C4)	Combine with C4 Leadership Team Review Completed		
C21	Unannounced inspections (other than in response to a complaint) result in scrambling by the source to identify a person to participate in the inspection and, on occasion, the designated air quality staff is not	Provide advance notice to a source in advance of an inspection (except for complaint investigations).	Ensures that designated air quality staff are onsite during an inspection.	Combine w/C24 and 25		N	N/A

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Maricopa County
Air Quality Department

	Issue	Recommendation/Proposed Solution	Benefit	Comment	Status	Valid Issue	Priority
	available.						
C22	Standardize sample collection forms.	Make sample collection forms (rule) specific. May refer to Title V sampling.		a title v sampling flow chart is being developed (who/when?)		No	N/A
C23	What constitutes an inspection report? Records part of report? NOV?			Will be addressed through an SOP			
C24	When inspectors visit a site they often will not be working with the same person from the facility. This leads to confusion and a lack of consistency.	Inspectors should remain in communication with the same site contact to the extent practical.		Combine w/C21 and 25		N	N/A
C25	From the facility point of view not receiving notice of an inspection creates various difficulties, e.g., a key contact may not be available for the inspection, the appearance of an inspector creates confusion and shuffling of staff that can be difficult to accommodate.	Unless an inspection is being conducted in response to a complaint, provide advance notice of the inspection.		Combine w/C21 and 24		N	N/A
C26	Compliance inspections - electronic record request submittals (when possible) and reduction in duplicate requests (providing a semiannual report which would have been required to already be submitted - so maybe proof it was submitted or ? rather than having to submit it again) and specific dates for spot checks rather than huge amounts of records.				Combine w/Records request C3		
C27	Inspection rights are provided during all inspections except NESHAP.	Extend the provision of inspection rights to NESHAP inspections.	While legally not required, for NESHAP inspections, the practice would promote consistency and provide the	Recommendation developed		Yes	High



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			person being inspected with basic information they should have.				
C28	A facility may require safety training for each visitor. If multiple inspectors visit a site then each must take this training.	Send a single inspector to avoid having multiple inspectors go through the training.	Time spent on training multiple staff will be saved.		Recommendation developed	Yes	Medium
C29	When access to conduct an inspection is denied there is no immediate information available to present that summarizes the steps the department may take to ensure future access.	Develop an informational fact sheet that can be presented to a facility in the event access is denied.	The fact sheet may provide sufficient information to allow the facility to better understand the rights to access held by the department and influence the facility to grant immediate access. Allowing immediate access would save time and make the inspection more efficient.			Yes	Low
C30	Following an inspection, the facility should have a contact number for the department, ideally the small business liaison.	Add the Small Business Office contact number listed on an inspector's business card.		Recommendation developed			
C30A	It is very difficult for anyone to know who to contact within the department for assistance. There is no staff directory online and most published numbers only get you to a voice mail system.						
C31	Expectations for completion of inspection reports may differ among inspector supervisors, e.g., details of how a site was in compliance with their permit conditions, no violations noted are okay for dust inspections but source inspections need more details.	Establish consistent expectations for the level of detail that should appear in an inspection report.	Greater consistency for reports developed by inspectors.	Will be addressed through an SOP. Combined with C20			



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C32	Should every instance of a no permit violation result in a notice of violation vs. a notice to comply? There are instances where a facility has attempted to identify all appropriate permits but did not identify the need for an air quality permit.	In some cases allow Notice to Comply (NTC) but not NOV to be issued to unpermitted sites. Establish a set period of time for unpermitted business owners to submit an application. Upon expiration of the set period, the NTC will be converted to NOV		Recommendation developed		Yes	High
C33	The department uses a shift log, an extremely time consuming record keeping device, that <u>does not add much value</u> if any to our Department	Eliminate the Shift Log that keeps track of inspectors SCK, VAC and OT. Matching leave slips to PeopleSoft records should be sufficient.	Eliminating this system would save hundreds of hours per year for Compliance Staff.	Refers to changes in employee's work schedule.		Yes	Low
C34	Permitting is not advised nor do they have the ability to determine if a performance test has been completed/passed.	Only the department's performance test engineer will have the test results. In some cases, the assigned test engineer makes no notation anywhere in EMS to share results with Permitting.	Better coordination and timely information flow to permitting.	Info has been placed into EMS for the past 6 months. This is a communication issue since this information is not widely known.	Resolved?		
C35	Facilities may have multiple sources, e.g., IC engines, gasoline tanks, fuel burning equipment, and solvent cleaning operations which may be addressed through permit conditions. An inspection of a sand and gravel facility covered by Rule 316 may not refer to these other sources in the inspection reports. The facility's comprehensive compliance status is, therefore, not fully understood on the basis of reviewing the inspection report.	Documentation of inspections should indicate whether the inspection is solely for compliance with Rule 316 or Rule 310.	The department and the facility would have a record of the entire compliance status or whether the inspection was narrowly focused on only a portion of the rules.	Address through an SOP Recommendation developed	Recommendation developed	Yes	High



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C36	State law requires that a copy of the report generated from an inspection be shared with a facility. Photos taken during an inspection are not normally attached unless separately requested. An NOV may also be sent without photos.	The photographs associated with inspection reports and NOVs should be provided at the time the documents are provided to a facility. One possibility is to use website posting so that only the facility can access the photos.	Increased awareness on the part of a facility of the evidence collected during an inspection.	Closely related to C37	Recommendation developed	Yes	High
C37	The descriptive content of an NOV may differ from that contained in a referral report or later versions of an NOV.	A facility should always have the most complete description of a violation. If the descriptive content of the NOV has changed, the facility should receive a copy.	A facility will have a better understanding of the basis of a violation.	Closely related to C36	Recommendation developed	Yes	High
C38	The department's governing statute allows, under certain circumstances, deficiencies (violations) to be corrected without recourse to imposing a penalty. The department is vested with considerable discretionary authority. The current approach imposes a penalty on many, if not most, violations.	The department should reevaluate its enforcement policy to consider greater use of the opportunity to correct.	The department will have a wider range of enforcement options and, where a facility did not knowingly cause a violation, greater flexibility to require compliance in lieu of a penalty.		Recommendation developed	Yes	High
C38A	The determination whether a site will receive a Notice of Violation or a Notice to Comply appears to be left to the discretion of the inspectors.	Developing a set of guidelines that help inspectors determine whether an NOV or an NTC should be issued to provide consistency across facilities and inspectors.	Greater certainty regarding what enforcement approach can be expected for a given class of violations.				
C39	Asbestos compliance reveals that some non-compliant actions are taken, in part, in response to a government directive. Some people remain unaware that additional regulatory obligations exist and believe the directive should have advised them of any additional requirements.	Work with other governmental entities to increase the awareness of asbestos requirements.	Greater compliance with regulatory obligations.		Recommendation developed	Yes	High
C40	Title V facilities are being inspected quarterly: ¼ = one full routine inspection (site visit) ¼ = one control device inspection (site visit) ¼ = one semi-annual monitoring report ¼ = one semi-annual monitoring report	Conduct one full inspection each year as noted in the fee table. Eliminate control device inspection which is not covered under the current fees.	Title V facilities have a very good record of compliance. Conducting only one inspection each year covering all facets of the four inspections now being conducted will result in improved efficiency. One less site visit will save time and incidental costs.	Recommendation developed	Recommendation developed	Yes	H-M



	Issue	Recommendation/Proposed Solution	Benefit	Comment	Status	Valid Issue	Priority
C41	Inspectors are now rotated from one coverage area to another about every three months. This rotation is very inefficient and inspectors are only just learning their area when they need to move on.	Eliminate the 3 month rotation of assignment areas for inspectors.	Inspectors will gain a better understanding of their assigned area. Facilities will get to know their inspector. Inspectors will be able to better identify unpermitted sites.		Recommendation developed	Yes	Medium
C42	Is there a need to collect a \$100 late fee for unpermitted sources? Collecting the fee and a penalty seems to be double punishment when the enforcement process can assess a penalty greater than \$100.	Eliminate late fee for unpermitted sources.	Improved efficiency of operations.		Recommendation developed	Yes	M-L
C43	At the end of an inspection, it may not be clear to the entity inspected what comes next.	A fact sheet or FAQ should be developed to provide information about what can be expected following an inspection.	Greater awareness of what may occur as a result of an inspection and when.	Resolved through development of a new cover letter	Resolved	Yes	Med-High
C44	Conducting a disposition inspection after a "No Permit Violation" is issued (to assure a permit application has been submitted) does not always mean the site/facility is in compliance. They may submit incomplete applications, and engineering may not be able to communicate with them. Conducting disposition inspections is not a solution; it only demonstrates that the "No permit violation" is a "non-issue".	<p>After the site/facility has submitted a permit application:</p> <ol style="list-style-type: none"> 1) Compliance should wait on approval or "non-approval" of a permit from Permitting (Permitting should also have a deadline to act) before conducting a disposition inspection. 2) Enforcement should not act until the permit is issued or until it has been determined that a permit is not needed. 	<p>This process assures that the site will be in compliance in all relevant respects.</p> <p>This process will also prevent scenarios where it is determined that the site did not need a permit, but the site/facility has already settled with enforcement.</p> <p>Will also eliminate cases where inspectors re-inspect the facility (upon a request from Permitting due to communication problems with site) and re-issues a "No-Permit Violation".</p>		Recommendation developed	Yes	Medium

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C45	Response Letters received by department without a received stamp. Site/Facilities have 10 days to request Ombudsman review. The only way to determine if the letter was received within the 10 days is if the letter is stamped by the department. Dates included with the letter may not always be accurate.	All received letters should have a date received stamp.	No uncertainty as to when a document was received.	Recommendation developed		Yes	High
C46	Employees want a forum where they can express problems they see with a process or rule - somewhere where their voice will be heard and where they can receive feedback. Although the process improvement group is a place to do this, it will not always be available.	Establish a team tasked to read issues and come up with solutions.				Yes	Medium
C47	When issuing No Permit Violations the site is obligated to pay a 100 dollar late fee per Rule 280, and they are also charged a greater penalty through the enforcement process. The enforcement penalty may include a collection of fees for those years they operated without a permit. We should not collect these fees as services were not rendered (inspections were not conducted).	The 100 dollar late fee should suffice.			Linked to C42 Recommendation developed	Yes	M-L
C48	Permits contain complicated requirements/conditions that may not be understood or complied with and may lead to difficulty in proving a violation if not identified early on.	Schedule compliance assistance (courtesy) style inspection prior to or just after permit issuance. This would be for all types of permits to ensure ongoing compliance through the lifetime of the permit.	Early compliance is assured. Ability to prove a violation is enhanced.			Yes	Medium
C49	The “inspections required” report in EMS appears to be missing some parameters. i.e. Inspections not being counted; such as Complaint Inspections are not being considered as a “comprehensive” Inspection. And there’s also an issue of next inspection dates and purposes. In many cases we are finding that those dates aren’t being taken into consideration. Note: it appears that other agencies may count a complaint	Consider counting a complaint inspection as a required inspection for some permit categories.	Avoid duplicate inspections for some sources.			Yes	Medium

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Maricopa County
Air Quality Department

	Issue	Recommendation/Proposed Solution	Benefit	Comment	Status	Valid Issue	Priority
	inspection as an inspection for purposes of meeting EPA's once in five year inspection guidelines.						
C50	Unclear what to do if a vapor certification test fails. How long of a wait is allowed? What if a test needs to be rescheduled?	Establish/augment the performance testing standard operating procedure to resolve these questions.				Yes	Low
C51	Higher priority items requiring supervisor review may languish in an "in-box" for an extended period of time.	Supervisors should have two in boxes – one for normal and one for high priority reviews, e.g, NOVs and closures				Yes	M-L
C52	Inconsistency/uncertainty in making records requests.	Records request form needs to be standardized				Yes	Med
C53	Current complaint line procedure is inadequate. Given supervisor schedules some complaints are not responded to in a timely manner	Ensure that during office hours the complaint line is manned so there is no extended lag time in response.	Improved complaint response – respond to urgent issues in a timely fashion.				
C54	Inconsistencies exist in the approach of some supervisors to some issues. Creates confusion and inconsistent application of the regulations.	Inspectors and supervisors need a common knowledge base. Emphasize in training and in protocols the need to ensure consistency of approach. Also, identify and encourage the development of subject matter experts.		Related to P34	Recommendation developed	Yes	High
C55	When inspectors issue a "no permit" NOV, they use a separate form.	Send a draft of the NOV to OSS to avoid duplication of entry.		Recommendation developed		Yes	High

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C56	Documentation for closing an NOV without a disposition inspection? How long to process?			From P78		Yes	High
C57	Is the universal inspector program efficient? Is expertise being diluted? Is it taking more time for supervisors to review NOVs as a result of their not being familiar with some program areas?			Related to P34		Yes	M-H
C58	Supervisors are taking too long to review NOVs.	Establish a deadline by which NOVs must be reviewed.				Yes	Med
C59	Inspectors are not allowed to change a complaint's status.	Inspectors should be allowed to change status after being assigned a complaint.	More efficient/timely updating of the database.	Clarification needed			
C60	The individuals at many sites have no idea of what we are inspecting and what we look at during an inspection. Should we create some kind of inspection summary to include with the permit conditions and or permit so sites know what to expect?	Develop an inspection checklist which lists the various elements of the inspection.				Yes	M-L
C61	Registered contractors frequently plead ignorance to the federal Asbestos NESHAP which regulates the renovation or demolition of public, commercial, industrial, institutional, and residential facilities and installations. Contractors in the renovation and demolition industry cannot compete with contractors who make bids not in compliance with the Asbestos NESHAP.	Open dialogue with the State of Arizona Registrar of Contractors to put the Asbestos NESHAP on the test for obtaining a license, which would achieve a result of producing informed contractors.				Yes	High



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C62	How long should each type of permittee be given to submit an application after an NOV is issued?			Transferred from Permitting March 10		Yes	High
C63	Performance testing has a backlog and the activity of performance testing is inherently more of an engineering task than a compliance task.	<p>For any report older than 2 years (negotiable), a cursory review will be done to identify any egregious errors. The validity of issuing a violation on a test older than 2 years would be subject to a great deal of questioning to which we may not have a good answer. (The details need to be refined and it would need the concurrence of Bill.)</p> <p>Require the electronic submittal of all test protocols and reports including data spreadsheets. This will allow a quicker QA/QC of test data and protocols and would relieve our storage issue.</p>		Transferred from Permitting March 10		Yes	High
C64	Emergency generator inspections require a large amount of time relative to the potential emissions.	Consider a change in approach where an annual report is required with ownership information and spot checks.				Yes	Med
C65	The placement of performance testing in a division separate from Permitting creates the opportunity for miscommunication and represents an inefficient use of resources.	Performance Testing should be repositioned in the Permitting Division since permit writers and testing staff are all engineers by education.	The potential exists for cross-training and shared tasks. Potentially, back-logs can be reduced and a more efficient staffing structure realized.	Transferred from Permitting list March 10		Yes	High

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C66	The process for documenting vacant lot inspections (especially those that are compliant is cumbersome.	Modify form or approach to a new documentation format.				Yes	H-M
C67	When any inspection is conducted, the party being inspected is interested in having documentation of any compliant conditions.	When conducting any inspection activity, prepare a checklist or form to document the observations – especially noting observations of compliance, and provide a copy to the inspected party.	Allows the inspected party to know when any inspection activity occurred and the results/specific observations made.			Yes	Med
C68	When a permit close out is requested via permitting, should an inspector be notified to conduct a final closeout walk through of a facility; verify lock out tag out and equipment break down?	A policy for permit closeouts should be developed addressing both permit and compliance-related concerns.		Transferred from permitting		Yes	Med
C69	Performance testing is facing a significant workload backlog. A formal written report (data entry and report writing) are time intensive and contribute to the backlog given the staff allocation.	<p>Conduct a cursory review of test reports. Data and calculations would undergo an abbreviated review and consistency check.</p> <p>A 1-page summary memo (highlighting what equipment was tested, the type of tests done and the emission results) may substitute for a full blown multi-page test report review.</p>	<p>This action would result in accelerated backlog elimination, more efficient use or resources to cover more facilities in a shorter amount of time, identification of potential emission/compliance/testing issues and improved communication between Performance Testing, the test company, the facility, and other divisions within MCAQD.</p> <p>This would save time, free up resources and help eliminate the test report backlog. If an issue arises on a past test that is being reviewed, then the reviewing engineer can alert the Performance Test supervisor who can document it in a database (or spreadsheet) and make the Performance Test group (and Permitting and Compliance Divisions) aware of the issue (whether it is test method or emissions related) so they</p>	Transferred from permitting		Yes	High



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			can watch for it on future performance tests, inspections and permit renewals/modifications. The supervisor can also contact the facility and/or test team and make them aware of it so they can correct the issue if necessary.				
C70	Expired permits may be in an expired status for months or even years.	<p>If a permit is expired more than 6 months, conduct a site inspection to verify the status of the facility. If no longer present, close the permit. If still operating, issue NOV and request a new app.</p> <p>Inspectors should conduct a review of expiration dates of permits in their area.</p>		Transferred from Permitting was P36	No longer an issue. Expired permit list now being generated and actively reviewed.	Yes	high
C71	Permit holders may be required to submit sampling data, or monitoring reports, to the department but there is not always acknowledgement by the department of receipt, acceptability, or compliance. This can leave sources open to changes in rule/report interpretations later when the data/report is reviewed at that time and it is discovered that there is something missing or in error, etc.	Establish a protocol that will acknowledge receipt of submittals to ensure source is in compliance or address source compliance in a timely manner.			Recommendation developed	Yes	H-M
C72	When a “no permit” NOV is issued, it is necessary to obtain a permit number from the One Stop Shop prior to issuing the NOV (so it (the NOV) has a home in the database system). Currently, a separate form is completed and sent to One Stop to obtain a permit number. Why can’t the NOV be used since it has the required information. Completing a separate form is duplicative and inefficient.	Send the draft NOV in place of the current duplicative form.	Less duplication	Not yet ranked			



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C73	Permit holders may not be cognizant of upcoming permit expiration or other matters that may be discernable to an inspector during an inspection.	Inspectors should proactively highlight issues of concern to a permit holder when discovered.	Permit holders are made more aware of matters they need to address to avoid a future NOV.				
C74	There is a need for a formal ombudsman policy and adherence to the policy. It seems that the ombudsman request not always takes the path that it should. A written formal request for ombudsman review is required in order for the ombudsman to review a case. It seems this formal request doesn't always happen. How many times can a source request his services, when can a site request his services (when violations are issued, or anytime there is an issue(NTC, compliant))? What should the formal request include (identify problem)?	Have a written policy of the procedure for ombudsman services. Policy should clarify the following: When must the formal request be made (or received)? How should the request be made? (there should be a form to fill out) What should the formal request include? A description of what there is a question about? A copy of the formal written request (received by the ombudsman) should be provided to the inspector and supervisor.	Provide guidance to customers. Will also shorten the time for the referral report to reach enforcement. Will provide guidance to customer, a form will help the customer communicate with the ombudsman (clarification of issue). By only reviewing specific identified issues the ombudsman will be able to focus his efforts on problems the source has identified (better use of time). The inspector and supervisor are made aware of possible issues during the inspection or interpretation of rule (enhance communication). Can serve as a training tool for compliance (consistency). It will also provide transparency within the department, no questions raised on whether a formal request was made.				

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C75	The current use of enforcement is a negative tool to achieve compliance. Is there an alternative method that can be used to create a compliance incentive?	Establish an incentive program that would extend a discount on annual fees to those facilities that are found to be compliant for an entire year..	<p>This will give facility the incentives they need to stay in compliance for the long run.</p> <p>This will show that the department rewards facilities for being in compliance and not always out to get facilities and take their money. Improve relations between county and facilities.</p> <p>This might also help unpermitted source come forward since they will save money in the long run, instead of hiding from us to save money.</p>				
C76	Some complaint response may not be of value (effective use of resources) given circumstances associated with the event.	Review current complaint protocols. Revise protocol to reflect results of evaluation. Ensure complaints are referred to agencies that are able to address the problem.	Reduce situations where a complaint response has very little value, i.e., no ability of department to effect any change, no department authority to change conditions causing a problem.				
C77	Multiple compliance inspectors visit a site which may result in inconsistency in communications and interpretations.	Identify one or two inspectors who will be designated for a certain facility.	Avoid continual confusion with differing communication and interpretations. Alleviate unnecessary use of time, reduce miscommunication, etc.				
C78	When an error (e.g., EMS, P+, and/or paperwork) is discovered the tendency is to resolve the concern for the immediate circumstance without addressing the underlying cause.	Create an expectation that any data entry issue is brought to the attention of the appropriate manager and that a system fix is initiated to resolve the problem to avoid recurrences.	Will help to create a more professional impression externally.				



Text in yellow highlight represents new or revised text from previous revision of this document.

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